

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ING BANK, N.V.,

Plaintiff,

v.

EXPRESS PACIFIC, LLC,

Defendant,

KEY BANK – MERCER ISLAND BRANCH,

Garnishee.

Misc. Action No. 2:17-mc-00064 RSL

APPLICATION AND DECLARATION  
FOR WRIT OF GARNISHMENT

THE UNDERSIGNED STATES:

A fee of \$47.00 is submitted herewith, payable to the Clerk of the Court.

As attorneys for the Plaintiff, I am making this Application and Declaration for a Writ of Garnishment on Plaintiff's behalf, pursuant to FRCP 64 and RCW § 6.27.060.

The facts are stated as follows:

1. On June 15, 2017, Plaintiff ING Bank, N.V. ("Plaintiff") obtained a judgment against Defendant Express Pacific, LLC ("Defendant") in the United States District Court for the Western District of Washington at Seattle. *See* Case No. 2:17-cv-00336-JCC, Dkt. # 15.

2. Plaintiff's judgment against Defendant is for \$2,103,750.00 plus interest at the rate of 4.5% per annum calculated from October 3, 2014.

APPLICATION AND DECLARATION FOR WRIT OF  
GARNISHMENT - 1

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3. Plaintiff's judgment against Defendant is wholly unsatisfied.

4. Plaintiff has obtained evidence that Garnishee Key Bank – Mercer Island Branch (“Garnishee”), whose business location is 2731 77th Ave SE, Seattle WA, 98040, may have possession or control of money, personal property, or effects belonging to Defendant, which are not exempted from garnishment by any state or federal law.

5. The Garnishee is not the employer of the Defendant.

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 30<sup>th</sup> day of June, 2017 at Seattle, Washington.

s/Jane Pearson

Jane Pearson, WSBA #12785  
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